

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

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JEFFERY PRESLEY, et al.,

Plaintiffs,

v.

**No. 4:05-CV-00148**

CHRISTOPHER EPPS, et al.,

Defendants.

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**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,  
EXPERTS' FEES AND OTHER LITIGATION COSTS**

Plaintiffs, by and through their counsel, hereby move pursuant to 42 U.S.C. § 1988, Rule 54(d)(2) of the Federal Rules of Civil Procedure, Paragraph 18 of the April 28, 2006 Consent Decree (Dkt. No. 24), and Paragraph 7 of the August 2, 2010 Order of Dismissal Without Prejudice (Dkt. No. 136) for an award of reasonable attorneys' fees, expert fees and other litigation costs for work performed in this case from November 16, 2007 through August 2, 2010.

Plaintiffs estimate that the total amount to which they are entitled for attorneys' fees for this period is \$202,500.00. They estimate that the total to which they are entitled for expert fees and other litigation costs for this period is 118,500.00.

Plaintiffs and Defendants intend to work together to reach an agreement as to fees and costs. Plaintiffs propose the following timetable for those efforts. On October 1, 2010, the parties will report back to the Court on the progress of their efforts to reach agreement. Assuming no agreement is reached, on or before November 1, 2010, Plaintiffs will file a

memorandum of points and authorities in support of this motion, setting forth the precise totals they claim for fees and expenses, together with Declarations of Counsel and schedules of counsel's contemporaneous time and expense records, in accordance with this Court's order. Undersigned counsel hereby represents to the Court that he has spoken with opposing counsel who agrees to the proposed timeframe.

Respectfully submitted,

/s/ Stephen Hanlon

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